

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

January 10, 2005

MEMORANDUM

SUBJECT: RASSB Review of TAED (004115, tetraacetythylenediamine) Ecotoxicity Literature Study Submitted in Support of new ai, non-food, indoor use laundry sanitizer.

DP 306815, 308402 - Registration No. 59825-R.

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THRU: Norm Cook, Chief *Norm Cook*
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TO: Marshall Swindell, RM - 33
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The Antimicrobials Division has reviewed supplemental literature submitted in support of tetraacetythylenediamine (TAED) registration. The first submission, MRID 46320005, contained a 2 page data summary from an unspecified German research paper. After contacting the registrant, a second submission, MRID 46362801, was received and contained an English translation of the entire paper:

Schoberl, P., Marl Huber, and L. Huber. 1988. Ecologically Relevant Data Relating to the Non-Surfactant Components of Washing and Cleaning Agents. Report of the working party "Degradation/Elimination" and "Aquatic Biotests" under the direction of Dr. P. Schoberl and Dr. L. Huber. Pg. 4-19.

This Schoberl et al, 1988 research paper describes the use of activated sludge test methods to assess degradation of TAED and DAED over time. The only references cited in this paper are for EPA and OECD bottle tests that evaluate chemical and microbial reduction in sewage sludge over a 28 day period. OPPTS tests are: 835.3200 – Zahn-Wellens/EMPA Test, and 835.5045 – Modified SCAS Test for insoluble and volatile chemicals. Similar OECD tests are 302A and 302B. No other test guidelines were cited in the above paper, therefore, it is not possible to accept EC and LC50 values cited for fish, aquatic invertebrates, and algae without further documentation of test methods/procedures and raw data used.

Conclusion:

The Schoberl et al, 1988 paper cited above does not provide sufficient ecotoxicity data (test methodologies or raw data) to evaluate the effects of TAED or DAED on fish, aquatic invertebrates, or algae. If you have any questions please contact Richard Petrie @ (703) 305-7358.